

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

**MOTION FOR ADMISSION PRO HAC VICE OF  
PERRY A. NAPOLITANO**

**Case Number:** 0:20-cv-01241-WMW-HB

**Case Title:** Patricia Freeman, on behalf of herself and all others similarly situated v. Ally Financial Inc. d/b/a Ally Financial, Resolvion, LLC, and 11th Hour Recovery

**Affidavit of Movant Thomas J. Posey**

I, Thomas J. Posey, an active member in good standing of the bar of the U.S. District Court for the District of Minnesota, request that this Court admit pro hac vice Perry A. Napolitano, an attorney admitted to practice and currently in good standing in the U.S. District Court for the Western District of Pennsylvania, but not admitted to the bar of this court, who will be counsel for Defendant Ally Financial Inc. d/b/a Ally Financial in the case listed above.

I am aware that the local rules of this court require that an active Minnesota resident, unless the court grants a motion for a non-Minnesota resident to serve as local counsel, who is a member in good standing of the bar of this court participate in the preparation and presentation of the case listed above, and accept service of all papers served.

I am not a resident of the State of Minnesota and hereby move for permission to act as local counsel under LR 83.5(d). I agree to participate in the preparation and the presentation of the case listed above, and accept service of all papers served as required by LR 83.5(d) should my motion for a non-resident to serve as local counsel be granted by the court.

Date: June 25, 2020

/s/ Thomas J. Posey

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**Affidavit of Proposed Admittee Perry A. Napolitano**

I, Perry A. Napolitano, am currently a member in good standing of the U.S. District Court for the Western District of Pennsylvania, but am not admitted to the bar of this court. I understand that if this Court grants me admission pro hac vice, the moving attorney identified in this motion must participate in the preparation and presentation of the case listed above, and must accept service of all papers served as required by LR 83.5(d). I further understand that the District of Minnesota is an electronic court and that I will receive service as required by Fed. R. Civ. P. 5(b) and 77(d) by electronic means and I understand that electronic notice will be in lieu of service by mail.

Signature: */s/ Perry A. Napolitano* Date: June 25, 2020

Typed Name: Perry A. Napolitano

Attorney License Number: 56789 Issued by: Commonwealth of Pennsylvania

Federal Bar Number (if you have one): N/A

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